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July 19, 2023

**VIA ECF**

The Honorable Edgardo Ramos, U.S.D.J.  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, NY 10007

**MEMO ENDORSED**

Re: *Gonzalez v. Hanover Ventures Marketplace LLC et al*  
Case No. 21-cv-01347 (ER)

Dear Judge Ramos:

We are counsel to Plaintiffs in the above-referenced case. We write to request a five (5) page extension on page limitations and one-week extension of deadlines regarding the briefing of parties' motions for summary judgment, and Plaintiff's class certification motion. Defendants have consented to the five-page extension, and Plaintiff has consented to a reciprocal extension. Plaintiff was unable to receive a response from Defendants regarding the one-week extension prior to the filing of this request.

Plaintiffs seek the additional week to fully address all of the issues presented in this matter, to fully prepare all relevant discovery for the Court's review, and to accommodate unexpected burdens on counsel's case schedule. Should this request be granted, the new briefing schedule is listed out below:


- Plaintiffs' moving papers for a summary judgment motion and class certification motion is extended one week to July 28, 2023.
- Defendants' cross-motion for summary judgment and opposition to class certification is extended one week to September 22, 2023.
- Plaintiffs' response and reply is extended one week to October 20, 2023.
- Defendant's reply is extended one week to October 27, 2023.

This is Plaintiff's second request to extend the above motions, which were originally due on July 12, 2019. We thank the Court for its time and consideration of this matter.

Respectfully submitted,

/s/ C.K. Lee  
C.K. Lee

The requests are granted. The parties may exceed the page limitation by five pages as requested. The Court adopts the proposed briefing schedule outlined herein, with the motions to be fully briefed by October 27, 2023. SO ORDERED.

  
Edgardo Ramos, U.S.D.J.  
Dated: July 20, 2023  
New York, New York